

**AKIN GUMP  
STRAUSS HAUER & FELD LLP**

Attorneys at Law

**TOM W. DAVIDSON**  
202.887.4011/fax: 202.887.4288  
tdavidson@akingump.com

March 26, 2010

VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Unlicensed Devices in the TV Broadcast Bands, ET Docket No. 04-186  
Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3  
GHz Band, ET Docket No. 02-380  
Notice of *Ex Parte* Presentation**

Dear Ms. Dortch:

On March 25, 2010, Neil Keon, founder of WSdb, LLC (“WSdb”), Ian Trumpower, Chief Financial Officer and General Counsel of 2M Companies, Inc., and Tom Davidson and Karen Milne, counsel for WSdb, met with Alan Stillwell, Bruce Romano, Geraldine Matise, Karen Ansari, Hugh VanTuyl, Ira Keltz, and Peter Georgiou of the FCC’s Office of Engineering and Technology (“OET”). The purpose of this meeting was to discuss and demonstrate a “beta” version of WSdb’s proposed white spaces database. During the meeting, Mr. Keon discussed the matters set forth on the attached document and responded to questions from the OET staff relating thereto.

Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Tom W. Davidson  
Tom W. Davidson, Esq.

Enclosure



**WSdb, LLC:**  
**Presentation to the Office of Engineering and Technology**  
**ET Docket No. 04-186**

**March 25, 2010**

**Presented by**  
**Neil Keon**  
**Founder**



## Agenda

- Demonstration of “Beta” Version of WSdb’s Database System
- Overview of WSdb’s Calculation of White Spaces
- Discussion of Flaws with Clearinghouse Approach

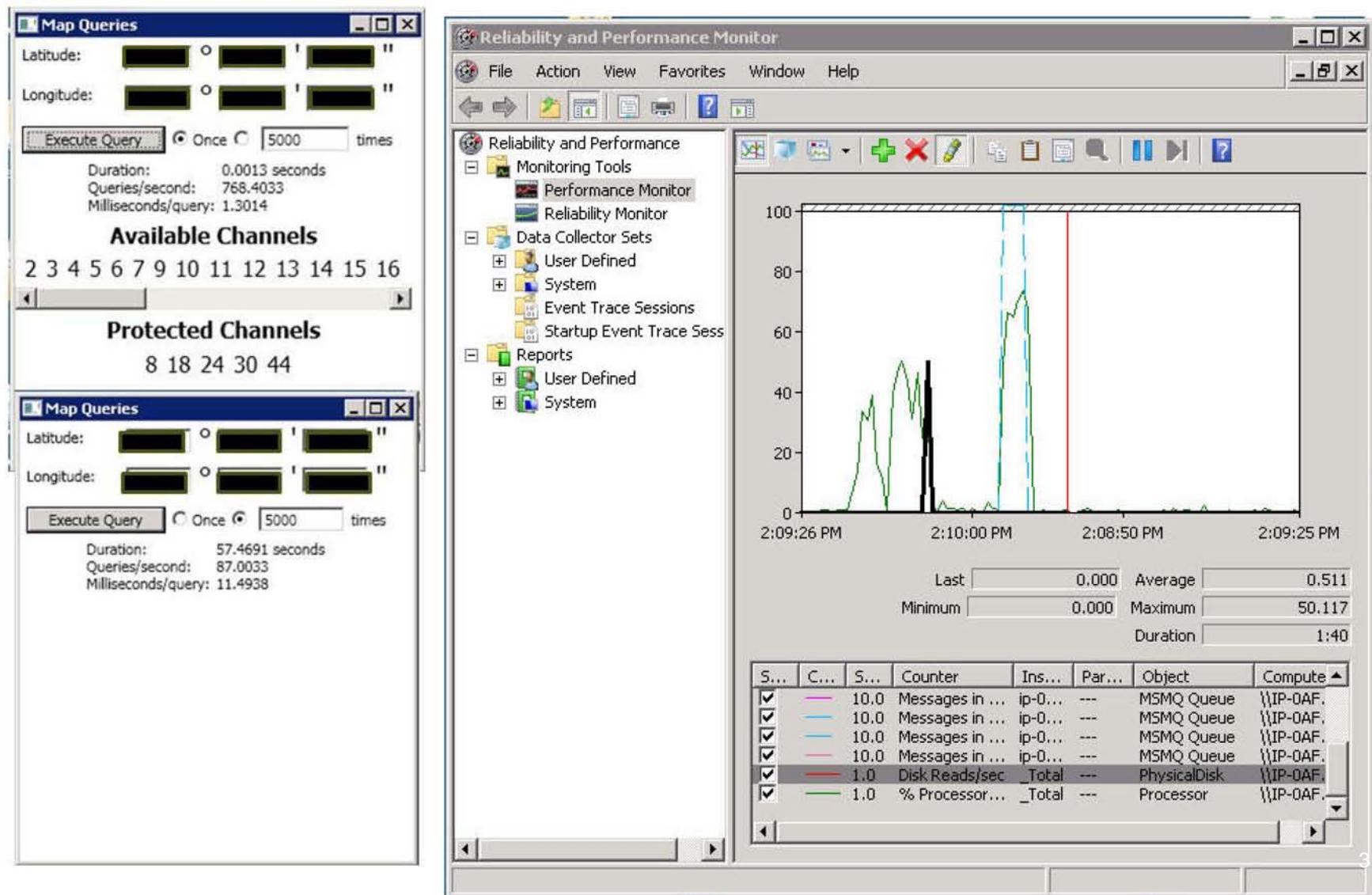


## A “Beta” Version of WSdb’s Database System Is Now Available

- WSdb’s proposed database system is a machine-to-machine implementation
  - ◆ High-speed performance
  - ◆ Modular implementation
  - ◆ Scalable and redundant
- Today’s presentation will demonstrate two components of this implementation:
  - ◆ Loading Client (including channel availability lists)
  - ◆ Mode II P/P Client

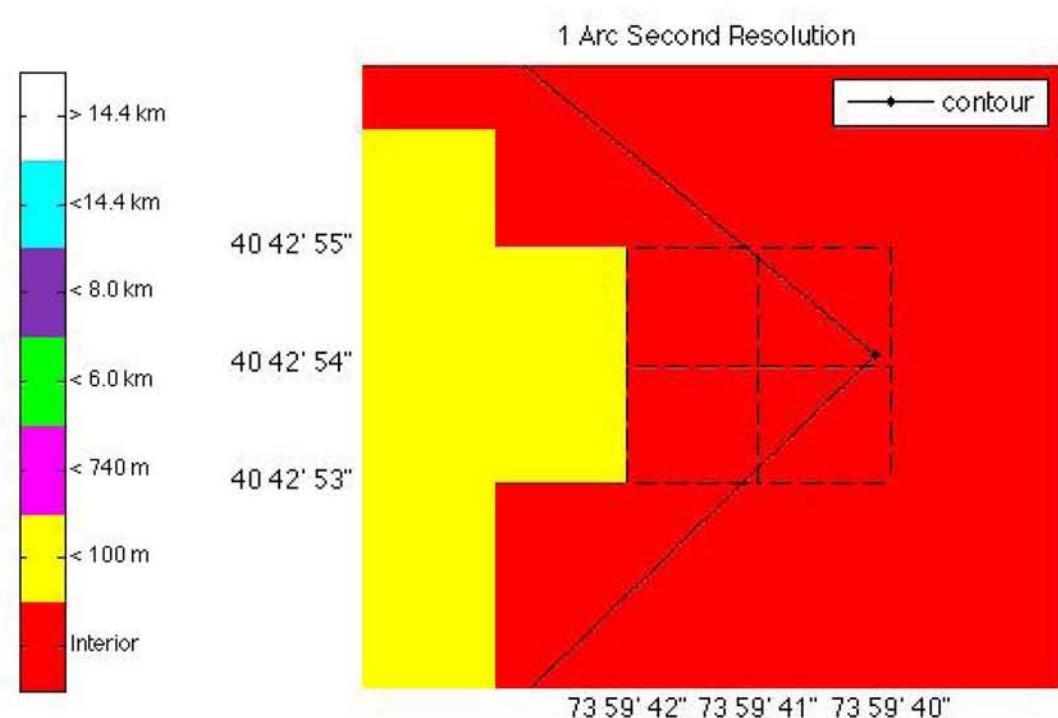
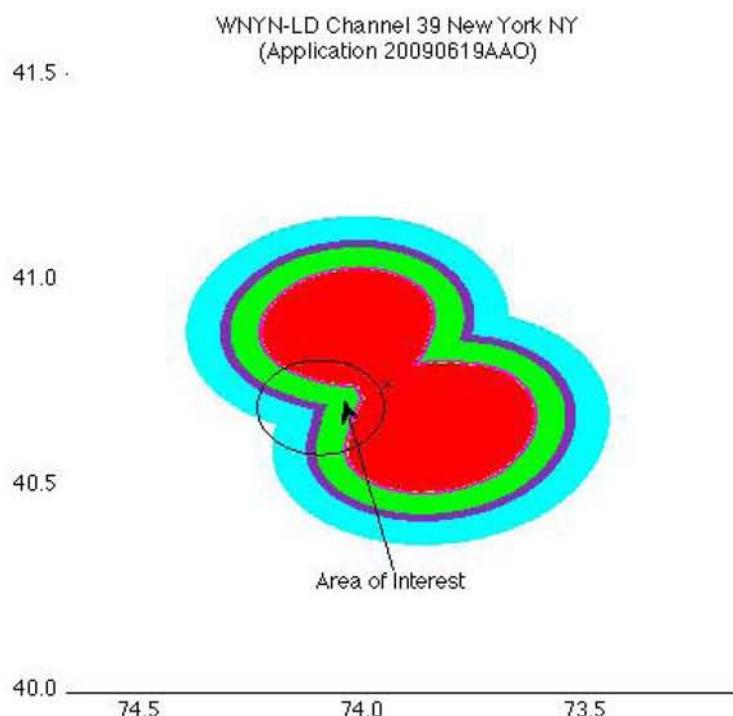


# The Loading Client Produces Accurate Responses to Thousands of Simultaneous Queries





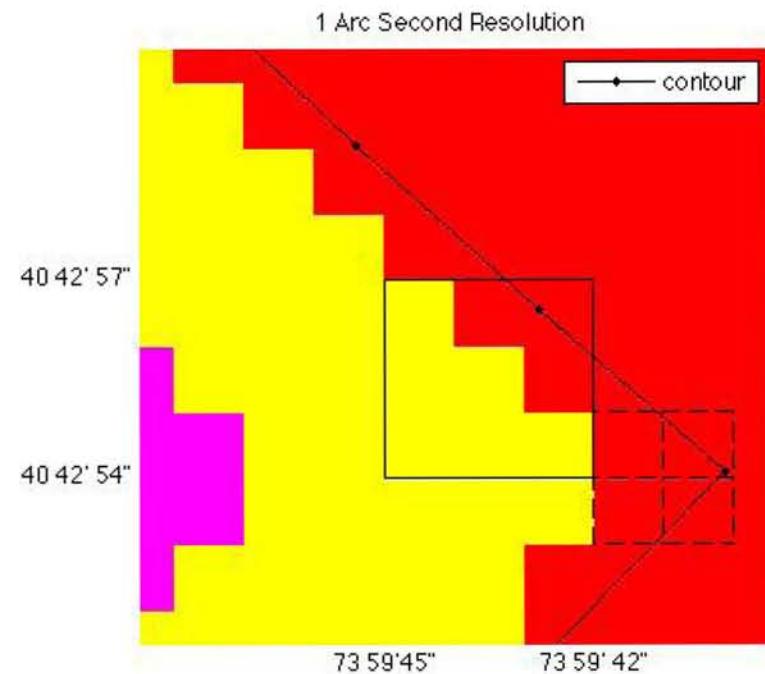
# Loading Client: Accurate White Spaces Calculations through Single Contour Spacing





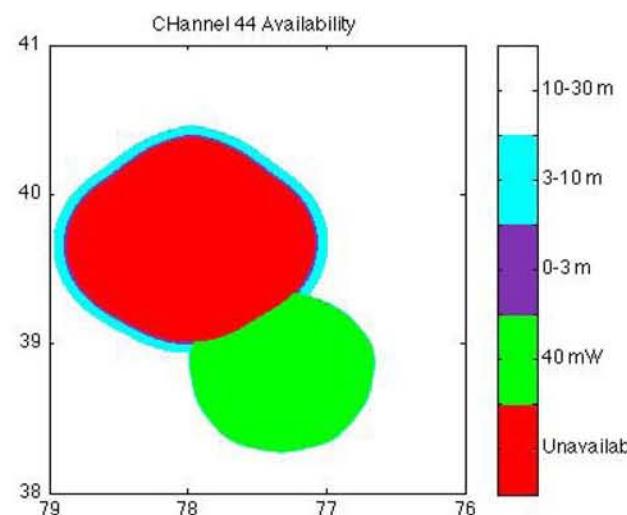
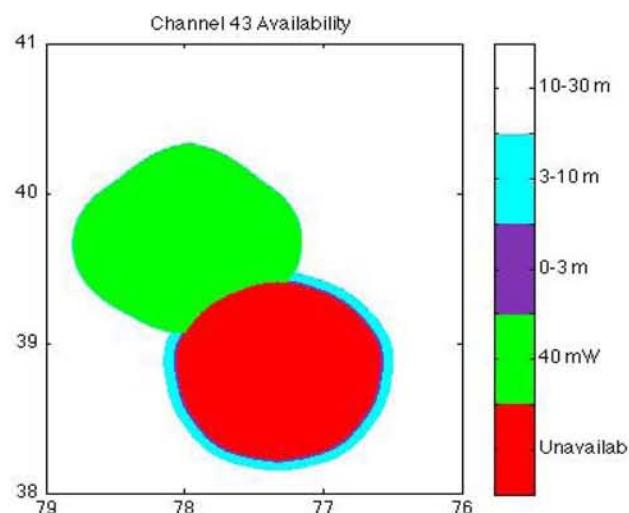
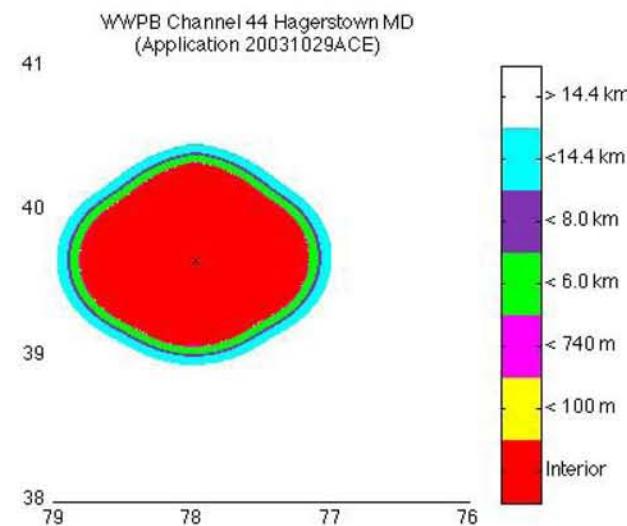
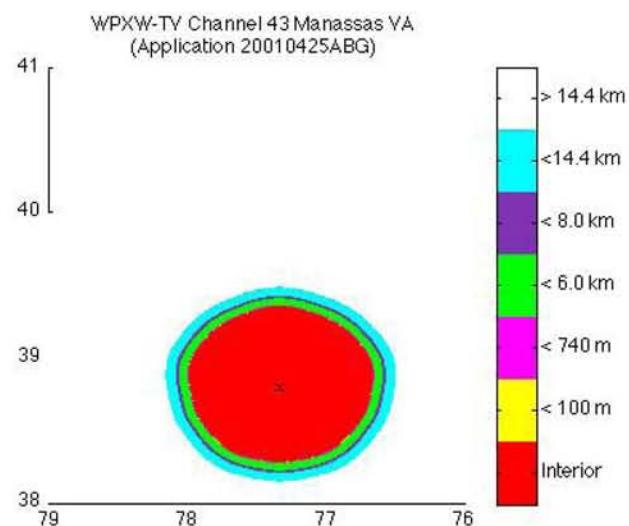
## Loading Client: Single Contour Spacing Produces Accurate Results Without Compromising Speed

- **WSdb's system always maintains 1 Arc Second resolution**
  - ◆ Fundamentally different than the 3 Arc Second grid proposed by Neustar
- **Channel availability at 1 Arc Second resolution calculated using proprietary system and methods**





# Loading Client: Accurate White Spaces Calculations through Channel Availability Maps





## The Mode II P/P Client Demonstrates that WSdb's Database System Supports “Movement”





## WSdb is in the process of enrolling manufacturers to participate in field testing of the “beta” version of its database system

- Distribute Loading Client and Mode II P/P Client to interested manufacturers
  - ◆ Currently engaged in discussions with interested parties
- Offer technical support to manufacturers participating in field testing
  - ◆ Refine its database system based on feedback from manufacturers as a result of the testing of its “beta” version
- Engaged in preliminary discussions with interested parties to develop a API for frequency coordination
  - ◆ Frequency coordination API may be added to field testing in the future



## The clearinghouse approach proposed by Neustar will inhibit innovation

- Database administrators should not be required to pay for “reference code” as proposed by Neustar
  - ◆ Standards for calculations have been publicly available for many years
    - Contours (Distance v Field Strength) - FCC/OCE RS76-01 or Akima’s Algorithm 474
  - ◆ Calculations can be purchased at low costs or implemented directly
- Database administrators should not be required to use a single “reference code” as proposed by Neustar
  - ◆ Significantly limits the ability to develop varying methods for processing data and computing interference calculations
  - ◆ Directly and negatively effects ability to compete on “speed and efficiency of service”



## **Consistent results are achievable without the imposition of a clearinghouse mechanism**

- Reliable protection can be provided by applying standardized protection criteria and using well-established standards for calculations
  - ◆ See previous slide
- Reliable results can be achieved by strict specification of a few parameters and data sources
  - ◆ Elevation Data Source, Number of radials, Number of HAATs, etc.
  - ◆ Clarification of initial set of protected television contours (e.g., LIC/STA/DS/CP MOD)



## **WSdb fully supports real-world testing of database systems to facilitate consistent results**

- The FCC should develop a means to ensure that solutions developed by potential database administrators will produce accurate results
  - ◆ Example: Library of test points
- Development and implementation of real world testing procedures for TVBD database systems should not delay the FCC's prompt selection of database administrators



## ■ Questions?